

In the Matter of)
) RM-10666
National Translator Association)
Petition For Rulemaking)
To Establish a Rural Translator Service)

June 15, 2003

REPLY COMMENTS OF KNME-TV

KNME-TV hereby submits reply comments in the above captioned proceeding. The National Translator Association (NTA) has petitioned the Commission to establish rules to expedite the processing of translator applications and to establish a digital TV translator service. KNME-TV fully supports the NTA petition with one limited reservation.

In regards to eligibility, the NTA has suggested that construction permits obtained by an adopted expedited rural translator service process be limited to six months.

KNME-TV 's single limited reservation and recommendation is that the Commission strongly consider an 18-month C.P. period. The reason is that it is very difficult for a non-commercial educational station to appropriately work a six month C.P. into its' fiscal budgetary plan.

If Department of Commerce (NTIA/PTFP) grant funding were submitted it would be entirely impossible to fund and construct within the proposed six month C. P. period. An eighteen month C.P. period is reasonable and one half the present C.P. period.

Additional six-month C.P. extensions beyond the original 18 months should be accepted upon strong justifiable showing of need. We believe this will assist and help to eliminate the warehousing of C.P.'s as intended by the NTA's petition without putting undo budgetary constraints on non-commercial educational stations.

John Ramp, Manager RF Transmission Services/KNME-TV